

Sealed

Public and unofficial staff access
to this instrument are
prohibited by court order

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**SHALONDRIA SIMPSON,
LASHONDRIA SIMPSON-CAMP, M.D.,
and SHAYLA BRYANT,**

Defendants.

§
§
§
§
§
§
§
§
§

Criminal No. 4:23-CR-00415

UNDER SEAL

MOTION TO UNSEAL INDICTMENT AND ISSUE SUMMONS

The United States moves to unseal the Indictment in this matter and issue summonses to all Defendants.

On September 7, 2023, the United States presented an indictment in this case to a grand jury in the Houston Division of the Southern District of Texas. The United States, which had been in discussions with counsel for all three Defendants about the investigation, sought to issue the Defendants summons rather than seek arrest warrants, and accordingly did not accompany the indictment with a motion to seal. On the afternoon of September 7, 2023, after the case had been presented to the grand jury, but before the indictment had been returned, counsel for Defendant Shalondria Simpson informed the United States that Defendant Simpson was departing to Jamaica. To date, none of the Defendants are aware of the indictment, although each are aware that they are the target of a federal investigation. The United States obtained an order to delay notifying Defendant Simpson and the other Defendants that an indictment was returned against her until after receiving notice of Defendant Simpson's return from Jamaica. The United States has confirmed Defendant Simpson's return.

Accordingly, the United States respectfully requests that the Court unseal the indictment and issue summonses to all Defendants.

Respectfully submitted,

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY

GLENN S. LEON
CHIEF, FRAUD SECTION

Andrew Tamayo
Andrew Tamayo
Devon Helfmeyer
Trial Attorneys
Fraud Section, Criminal Division
U.S. Department of Justice
(202) 794-4211
Andrew.Tamayo@usdoj.gov